COLORADO SMELTER BACKGROUND, SITE STATUS AND UPCOMING PLANS
JUNE 27, 2018

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SITE HISTORY/BACKGROUND:

Pueblo was once home to five ore smelters and is still home to one active steel mill. Their industrial heritage is extremely important to Puebloans. The Colorado Smelter historical footprint is bound by Santa Fe Avenue to the east, Mesa Avenue to the south, Interstate 25 to the west, and the Arkansas River to the north. The Bessemer, Eiler and Grove neighborhoods are adjacent to the former Colorado Smelter site, which now consists of building remains and an approximately 700,000-square-foot slag (waste) pile.

The Colorado Smelting Company smelter (also known as Colorado Smelter, Boston Smelter, Boston & Colorado Smelter, and Eilers Smelter) operated in the Eilers and Bessemer neighborhoods from 1883 to 1908. It was constructed on a mesa and waste slag was deposited in a ravine between Santa Fe Avenue and the Denver & Rio Grande railroad tracks. The potential for contamination at the Colorado Smelter site was discovered in the mid-1990s during an earlier inspection of the Santa Fe Bridge Culvert site, which discharged orange-colored water to the Arkansas River. In 2010, CDPHE conducted a focused site inspection of properties surrounding the Colorado Smelter; this study determined the presence of elevated lead and arsenic levels. EPA listed the site on the National Priorities List in December 2014, due to its concern about high levels of arsenic and lead (metals) that had been identified in smelter slag and neighborhood soils and which pose a threat to current and future residents.

There are approximately 1,900 residential parcels in the preliminary study area, which covers a half-mile radius from the smokestack of the former smelter. Ninety-five percent of the homes are pre-1978 (before the lead paint ban). They are predominantly single-family detached homes, many with bare-soil yards.

Timeline:

- December 11, 2014 - The Colorado Smelter was added to the National Priorities List (NPL) and EPA funded a grant to the local health department to develop a Lead Program;
- December 2015 - Site characterization began;
- June 2016 - Indoor dust cleanups began;
- September 26, 2017 - EPA and the State of Colorado signed the interim Record of Decision (i-ROD) for residential soils and indoor dust cleanup;
- August and November 2017 – US Army Corps of Engineers Interagency Agreements approved
- December 2017 - Emergency Response program cleanup of Benedict Park play area under a time-critical removal action, which included soil removal and new pea gravel replacement.
- January 2018 - Outdoor soil cleanups began;
- February 2018 - RA identifies need to increase annual funding; and
- June 2018 – Headquarters releases commitment of $15 million per year for OU1 residential cleanups 2018 - 2022

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Community Participation:

The site has strong community participation and many stakeholders. The Community Advisory Group (cag) has been meeting monthly since 2014. Their primary concerns, as communicated through Governor Hickenlooper's letter to EPA requesting addition of the site to the NPL are: ensuring EPA receives consistent funding to clean up the site quickly, effectively, and collaboratively to prevent health related risks; use local labor and materials; and improve the health and safety of the historic neighborhoods. The Governor supported EPA tackling the highest risk areas first, which corresponded to EPA prioritizing the residential properties. Despite that, the city council pressed EPA on sampling and addressing city-owned properties. Therefore, we completed sampling on three city parks, two vacant city-owned residential parcels, and 85 unpaved alleys. The two other parks are clean and the alley data indicate that only two alleys have lead over 800 parts per million. Further data review and risk evaluation are needed by the EPA and State project managers and risk assessors to determine if alley cleanups are needed, and if so, the alley cleanup levels and possible cleanup approaches.

Public Health Interest:

- In 2014, EPA funded a grant, which is supplemented by the State health department, so the local health department could develop a Lead Program. The grant provides for blood lead testing and healthy home screenings at no cost for those living within the Superfund preliminary study area and at low cost to Pueblo residents outside the study area. The Lead Program also provides educational materials and risk reduction materials (cleaning supplies) to residents of the study area.
- The EPA, PCCHD and CDPHE work together closely to prevent exposures to smelter-related contaminants. One limitation in our multi-pathway approach with Pueblo and the State is lead-based paint, which cannot be addressed by the Superfund program. This lead source continues to be a challenge for this site and Pueblo at-large; however, the local health department may be applying for HUD healthy homes grant funding.
- As of April 10,2018, the local Lead Program's percentages of Elevated Blood Lead Levels (EBLL) for 0-6 years of age compared to the County and State are:

Site EBLLs*	County EBLLs*	State EBLLs**
9.3%	5.5%	2%
Notes: * Pueblo Department of Public Health & Environment Data ** Colorado Department of Public Health & Environment Data		

Economic Development and Community Revitalization:

Community vitalization, redevelopment and reuse are of interest to all parties – City and County representatives, EPA, CDPHE, HUD, CDOT, EDA and others meet regularly to discuss potential future use and plan for future public events to gather input. We have very engaged and supportive congressional representatives at the site. They are interested in ensuring the project gets continued funding and that work continues to move as quickly as possible.

CLEANUP STATUS SUMMARY:

- Soil Cleanups: Focused Feasibility Study Baseline = 817 (43% of 1900 homes in study area)

  - Status: As of June 26, 2018, we have completed the following cleanup activities:
    - 44 total cleanups of lead-contaminated soils (3 additional to be completed by June 29.
    - Benedict Park play area soils were cleaned up in December 2017.
- Dust Cleanups: Baseline = 570 (30% of 1900 homes in study area)
  - Status: As of June 15, 2018, we have completed the following cleanup activities:
    - 34 total cleanups of lead-contaminated interior dust. (Twenty-seven emergency indoor dust cleanups (June 2016 – July 2017) and seven additional priority indoor cleanups (December 2017)).

SAMPLING STATUS SUMMARY:

- RI status: As of June 15, 2018, we have completed the following sampling activities:
  - 446 homes sampled indoors for lead dust and other metals;
  - 774 homes sampled outdoors for lead and other metals in soil;
  - 4 parks' soils sampled - Bessemer, Benedict, & Stauter Field, Bessemer School Park;
  - 85 unpaved city alleys sampled within the study area (only two alleys lead levels are above 800 ppm);
  - 2 vacant city parcels sampled (no cleanups needed); and
  - Bessemer Academy School sampling (no cleanup needed; results in process of being shared with the School District).
- Decision Document Status: Planned i-ROD amendment, Final ROD (date TBD)

CONTRACTING STRATEGY:

- Contract type and structure: Cost plus fixed fee; 5-yr planning; Base contract with options (fee applied only when options needed)
- Late June 2018: RFP for MATOC long-term contract announced.
- Late August to September 2018: MATOC contract awarded
  - $35 Million for up to 5 years including options; however, at accelerated pace, the initial MATOC ceiling may be reached in 2+ years.
    - $3 M in initial phase targets the completion of up to 40 soil and 15 indoor dust cleanups; followed by
    - $32 M in multiple options which will be awarded in chunks with completion of up to 455 soil and 195 indoor dust cleanups
  - After the initial $35 M MATOC ceiling is reached, an updated new competitive MATOC will be re-advertised or EPA will initiate the RAF process.
- Technical Evaluation Panel: schedule; structure (possible OSRTI participation)
- Cleanup crew sizes and possible pace of indoor dust and soil cleanups will be quantifiable after the MATOC bids are received (late July). This will affect our anticipated cleanup milestones.

CLEANUP MILESTONES/DEADLINES:

- Region 8 anticipates that approximately 150 soil and 106 indoor dust cleanups may be completed per year with the increased funding that HQ has provided to the Region.
- August 20, 2018: Completion of up to 47 soil cleanups and yard restorations and up to 12 indoor dust cleanups under the Rapid Response contract.